

# **EXHIBIT A**



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April 22, 2021

**VIA FEDEX AND EMAIL**

Brixley Bags, LLC  
361 North 725 East  
Vineyard, UT 84059  
info@brixleybags.com

Re: Thread Wallets, LLC Intellectual Property  
WN File: 22075.71

To Whom It May Concern:

This firm represents Thread Wallets, LLC (“Thread Wallets”) in its intellectual property and related matters. As you may be aware, Thread Wallets designs, manufactures, and markets innovative wallets, phone cases, and accessories. You may view some of Thread Wallets’ products at [www.threadwallets.com](http://www.threadwallets.com).

Among other products, Thread Wallets designed and sells a cross-body bag available at, among others, <https://www.threadwallets.com/products/aqua-crossbody-bag> (“the Thread Crossbody Bag”). Thread Wallets’ distinctive design for its crossbody bag includes a number of features that help make it readily identifiable, and thus set it apart in the marketplace relative to competitors. Those distinctive elements include, among other things, the size, dimension and arrangement of parts shown on the Thread Crossbody Bag below. Thread Wallets also has multiple design patents pending on this design and expects those applications to issue in due course. Thread Wallets has invested substantial time and resources in its products and the intellectual property that is integral thereto. In turn, Thread Wallets has developed and enjoys a significant reputation and considerable goodwill amongst the consuming public.

It has come to Thread Wallets’ attention that Brixley Bags, LLC (“Brixley Bags”) is offering for sale a line of bags (“the Brixley Crossbody Bags”) that is substantially similar to the Thread Crossbody Bag, as shown in the side-by-side pictures below:

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Brixley Crossbody Bag <sup>1</sup>	Thread Crossbody Bag
	

<sup>1</sup> See, e.g., <https://brixleybags.com/products/slate-crossbody-sling>.

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Brixley Crossbody Bag <sup>1</sup>	Thread Crossbody Bag
	
	

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Brixley Crossbody Bag <sup>1</sup>	Thread Crossbody Bag
	

As you can see, the Brixley Crossbody Bag is virtually identical to the Thread Crossbody Bag, from the overall design down to details such as the placement of the logos on each bag. Consumers are likely to be confused by the similarities between the bags and may believe the Brixley Crossbody Bag is affiliated with Thread Wallets when it is not. Such confusion is even more likely since Brixley Bags and Thread Wallets are both Utah companies based within Utah County.

We are sending this to notify Brixley Bags of Thread Wallets' intention to enforce its intellectual property rights, including its design patent rights should they still cover the above design at issuance. As such, Thread Wallets asks that Brixley Bags move to a different design of crossbody bag once it sells through its current inventory. Confusion between the Brixley Crossbody Bag and the Thread Crossbody Bag would not be beneficial to either company. If Brixley Bags is still selling the Brixley Crossbody Bag when Thread Wallets' design patent issues, Thread Wallets will not hesitate to enforce its patent rights.

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Please acknowledge receipt of this letter and give us your written assurance on or before **May 5, 2021** that Brixley Bags will cease selling the Brixley Crossbody Bag once it sells through its existing inventory. Although Thread Wallets hopes the parties can resolve this matter amicably, it reserves its rights based on the claims outlined herein and any other claim available to Thread Wallets under all applicable laws.

Sincerely,

WORKMAN NYDEGGER

A handwritten signature in black ink, consisting of a large, sweeping arch followed by a vertical line and a small horizontal stroke at the end.

JAMES W. McCONKIE III

JWM:sc  
(44088551.1)